

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM JOSEPH KING,

Defendant.

Case No. 24-CR-81-JDR

United States' Sentencing Memorandum

Adam King sexually abused and exploited his girlfriend's young daughter for years. King used his relationship's sex toys to bind, blind fold, gag, and sexually abuse the small child. King's conduct, dangerousness, history, and the other 18 U.S.C. § 3553 factors support the sentence contemplated by the Guidelines: life in prison. *See* King PSR ¶¶ 26, 43.

Facts

A federal jury found King guilty of Aggravated Sexual Abuse of a Minor under 12 Years of Age in Indian Country and Abusive Sexual Contact with of a Minor in Indian Country. (Dkt. #94). The convictions are the consequence of King repeatedly sexually abusing his girlfriend's daughter, MV, when she was eight-to-eleven-year-old. The PSR summarized the offense conduct. PSR ¶¶ 6-7. But this Court no doubt remembers learning at trial that King used his father-figure position in MV's life to

exploit her trust and her young body for sexual gratification while she was in his care and custody.

The Court will also recall MV's compelling testimony in which she described how King frequently strapped handcuffs around her young wrists, tied her down on his bed, blind folded her, and put a ball gag in her mouth. How King touched and penetrated her vagina with his fingers, penis, and various sex toys that she could not see, but which felt different to her body. And how King made her touch his penis with her mouth and hands. King warned MV not to tell anyone about his abuse, and she complied for some time until confiding in her friend at school.

OSBI scientists compared DNA samples taken from King's sex toys to King and MV's known DNA samples. Their comparisons revealed MV's DNA on several sex toys, including a few that MV recognized and identified. Yet MV's mother, refused to believe that King abused MV. Her actions forced MV's grandparents to take custody of MV and her brother for their protection. The children remain in their custody to this day.

King's horrendous actions upended MV's world. At King's sentencing on January 22, 2025, this Court should sentence King to life imprisonment.

Argument

I. The nature and circumstances of King's sexual abuse supports a life sentence to reflect the seriousness of the crime, promote respect for the law, and provide just punishment for the offense.

The nature and circumstances of the defendant's offenses truly shock the conscience. Instead of caring and parenting his girlfriend's young daughter, Adam King sexually abused MV repeatedly. Adam King took the favorite parts of his sexual with MV's mother—bondage and sex toys—and he used those on a young child. King tied down, blinded, and gagged MV like he would an adult woman and then he stimulated MV's genitals with his fingers and vibrators, and he penetrated her vagina with his hands, penis, and vibrators. Not once. Multiple times.

King stole MV's innocence and scarred her future experiences. MV's first sexual experience will not be with a beloved partner at MV's chosen time. Instead, MV's first experience involved her father-figure binding, blinding, and gagging her before he abused her young body. MV will likely always associate sexual activity with trauma.

King's repeated abuse will likely cause MV's life-long attachment issues and traumatic responses that she may never understand and overcome. Issues that will likely impact her relationships, family members, and her own children. King is the direct cause of this and he should be sentenced to the maximum allowable sentence.

II. King's history and characteristics support a Guideline sentence.

As to King himself, he recounts a neglectful and abusive childhood. King had every opportunity to take his adverse childhood experiences and ensure the children in his

life had a better experience. Instead, he chose to sexually abuse MV. The alarming nature of King's decision to sexually abuse MV and then portray himself as a loving and caring father-figure cannot be understated and warrants life imprisonment.

III. King bondage and sex toy-riddled abuse demands a Guideline sentence of life in prison to provide adequate deterrence to this defendant and others.

The trauma caused by King repeatedly sexually assaulting MV can never be adequately reflected in any prison term. Although MV is now safe from King, she is unquestionably left with the long-term impacts of his abuse. The Guidelines make clear that child sexual abuse is serious in all instances. This case is no different. Ordering King to serve the remainder of his life in prison is appropriate based on his conduct and meets the sentencing goals outlined in 18 U.S.C. § 3553(a)(2).

King has demonstrated that he is a danger to the public. As this Court saw and heard at trial, King successfully and heinously sexually abused MV for years without her disclosing his abuse. King even convinced MV's own mother that MV lied to maintain allies. These facts underscore the risk that King poses to children in the future. "Congress [has] explicitly recognized the high rate of recidivism in convicted sex offenders, especially child sex offenders." *United States v. Allison*, 447 F.3d 402, 405-06 (5th Cir. 2006); *see also United States v. Pugh*, 515 F.3d 1179, 1201 (11th Cir. 2008) ("As Congress has found and as we have discussed, child sex offenders have appalling rates of recidivism and their crimes are under-reported."). A Guidelines sentence will protect children from further crimes of the defendant.

Moreover, deterrence and protection of the public are particularly weighty factors in this case. King sexually assaulted a defenseless child for years, and then successfully took steps to discredit her when she reported the abuse, as well as turn her family against her. He must not be allowed back into society. This Court is best able to ensure that he never has the opportunity to exploit another child.

No general deterrence is gained by a sentence short of the Guidelines. King's conduct, history, characteristics, and failure to accept responsibility provide no mitigating factors worthy of a downward departure. These are serious crimes and should be treated as such. A below Guideline sentence would not achieve the sentencing goals of adequate punishment, general deterrence, or public safety.

Conclusion

Considering the serious nature of the defendant's offenses, his personal characteristics, the need to protect children from his future crimes, just punishment, deterrence, and the need to promote respect for the law, the United States respectfully requests the Court sentence King to life in prison. The Government further requests a lifetime term of supervised release, to include the imposition of the Special Sex Offender Conditions.

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Certificate of Service

I hereby certify that on January 10, 2025, I electronically submitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

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